



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

2001

Victoria Golf Course

CERCLA files

August 11, 2000

MEMORANDUM

SFUND RECORDS CTR
2388336

SUBJECT: Draft ^①Victoria Golf Course/^②Martin Adams Dump Quality Assurance Project Plan, Carson, Los Angeles County, California (EPA QA Program Document Control Number [DCN] ZZCA151Q00VSF1)

FROM: David R. Taylor, Ph.D., Senior Document Reviewer
Quality Assurance Office, PMD-3

David R. Taylor

THROUGH: Vance S. Fong, P.E., Manager
Quality Assurance Office, PMD-3

Vance S. Fong

TO: Rachel Loftin, Site Assessment Manager
States, Planning and Assessment Office, SFD-5

A quality assurance project plan (QAPP) for the Victoria Golf Course (VGC) and Martin Adams Dump (MAD) Site investigations, prepared for the U.S. Environmental Protection Agency (EPA) by Ecology and Environment, Inc. (E&E) and dated July 18, 2000, was reviewed. The review was based on guidance provided in the following EPA documents and memoranda: "EPA Requirements for Quality Assurance Project Plans" (EPA QA/R-5, November 1999); "Guidance for the Data Quality Objectives Process" (EPA QA/G-4, September 1994); "Use of Low-Flow Methods for Ground Water Purging and Sampling: An Overview" (December 1995); and "Documentation of Data Validation Requirements in Quality Assurance Project Plans (QAPPs), Field Sampling Plans (FSPs) and Sampling and Analysis Plans (SAPs)" (January 14, 2000).

The QAPP addresses most of the elements required by EPA guidance. However, some concerns were noted during the review and are discussed in the body of the below.

Concerns

1. [Approval Page] The QAPP does not include an approval page having the approval blocks for E&E and EPA personnel. This should be provided.
2. [Table of Contents] The provided table of contents (TOC) is incomplete; it does not include all sections, figures, tables, and appendices of the QAPP. The TOC should be revised.
3. [Distribution List] The QAPP does not provide a list of individuals and their

Ms. Rachel Loftin
August 11, 2000

organizations who will receive copies of the approved QAPP. This should be provided.

- 4A. [Section 1.1, Project and Task Organization] The QAPP does not provide an organization chart showing the relationships and the lines of communication among all project participants. This should be provided. The organization chart must also identify any subcontractor relationship relevant to the project, including analytical laboratories. The QAPP does not identify an analytical laboratory for the project. This needs to be clarified, since the Region 9 Regional Sample Control Coordinator (RSCC) cannot schedule samples until it is known that this is a requirement. (Also see below comment on Section 2.2)
- 4B. Section 1.1 states that descriptions of START program personnel roles are provided in the Generic Quality Management Plan (QMP, E&E 1995), however, it is preferable that the QAPP describe the roles and responsibilities of key project participants including Ms. Cindy McLeod, E&E Site Assessment Manager, who is identified in Appendix A, Data Quality Objectives.
- 5A. [Section 2, Measurement and Data Acquisition; Table 2-1, Field and Laboratory Quality Control Guidelines] Currently the plan specifies only SW-846 methods for the analysis of soil and groundwater; it should be clarified whether Contract Laboratory Program (CLP) methods would also be acceptable if Region 9 will be scheduling the analyses.
- 5B. Section 2 does not address the data management procedures for the project. The QAPP should describe the project data management process, tracing the path of data from their generation to their final storage.
- 5C. Section 2.2 states that groundwater samples will be analyzed for total and dissolved metals by EPA Method 6010B. It is recommended that filtration requirements including filter type for the dissolved metals be specified. Note: For site assessment, EPA recommends collecting unfiltered samples for volatile organic compound (VOC) analyses using low-flow methods. Note also that filtration must take place in the field if samples will be sent to the CLP as there is not provision in CLP contracts for laboratories to filter samples.
- 5D. The footnote to Table 2-1 indicates that field blanks will be collected for the water matrix only. It is recommended that some type of blank samples also be collected for soil gas samples (equipment or ambient field blank).
- 5E. Section 2 does not indicate that cyanide analysis is targeted for the project. Note the data quality indicators (DQI) table in Appendix B, indicates analysis of cyanide. This issue should be clarified.

Ms. Rachel Loftin
August 11, 2000

- 6A. [Section 4, Data Validation and Usability] Section 4.1 indicates that 100% of the packages will be fully validated. Note that Region 9 QA office has implemented a new tiered validation system (EPA memorandum, January 14, 2000). The QAPP should document the data validation requirements consistent with Region 9 policy. If 100% validation is needed, this should be discussed by the Site Assessment Manager with the Manager of the QA Office.
- 6B. Section 4.1.1 states that the START or ESAT contractor will perform data validation according to National Functional Guidelines for Organic Data Review. The QAPP should also reference the National Functional Guidelines for Inorganic Data Review as inorganic analytes are also targeted for analysis, unless these measurements are not critical to decision making and do not need validation. If this is the case, it should be so stated..
- 6C. Section 4.2 states that the procedures described in the Generic QMP (E&E, 1995) will be used to validate the data packages. The QAPP should describe these procedures or attach them to the QAPP. This statement is also not consistent with current QA Office policies and agreements made with EPA contractors in this area, since it predates them.
- 7A. [Appendix B: Statements of Work and Data Quality Indicators] The statement of works (SOWs) should specify that the Complete SDG File inventory include data package page number(s) for each required element. (Similar to Form DC-2 in the CLP).
- 7B. The SOWs should specify that the method blanks will be analyzed after the continuing calibration standard with each batch of samples and that the raw data and summary forms for all method blanks shall be provided.
- 7C. To ensure that the data package is complete, including Chain of Custody forms, the SOW should specify the requirement of signature by laboratory personnel indicating packages are complete when leaving the laboratory.
- 7D. The SOWs should specify that if regression is used for data reduction, the formula must be provided and the variables be labeled with the proper units.
- 7E. The SOWs should specify the submission of all data and forms for all usable re-extracted and reanalyzed data.

Comments

- 1. [Section 1.2.2, Martin Adams Dump; Figure 1-2, Site Location Map - Martin Adams Dump Site] The Martin Adams Dump Site location map should be labeled as 1-2 instead

Ms. Rachel Loftin
August 11, 2000

of 3-1.

2. [Sections 1.4.5, Data Quality Indicators (DQIs); 2-3, Quality Control Requirements]
Sections 1.4.5 and 2-3 reference Table 1-1 for DQIs. Table 1-1 could not be located.

If you have any questions, I can be contacted at 415-744-1497.